

Revised 12/03

CORRES CONTROL
INCOMING LTR NO

00199RFO4

DUE DATE

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2001 MAY -6 A 7 23

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

DIST	LTR	ENC
BERARDINI J H	X	X
BOGNAR E S	X	X
BROOKS L	X	X
BUTLER L	X	X
CARPENTER M	X	X
CROCKETT G A	X	X
DECK C A	X	X
DEGENHART K R	X	X
DIETER T J	X	X
DIETERLE S E	X	X
FERRERA D W	X	X
GIACOMINI J J	X	X
LINDSAY D C	X	X
LONG J W	X	X
LYLE J L	X	X
MARTINEZ L A	X	X
NAGEL R E	X	X
NESTA S	X	X
NORTH K	X	X
PARKER A M	X	X
RODGERS A D	X	X
SHELTON D C	X	X
SPEARS M S	X	X
PIZZUTO V M	X	X
TOBIN M	X	X
TUOR N R	X	X
WIEMELT K	X	X
WILLIAMS J L	X	X
ZAHM C	X	X

April 30, 2004

Mr Joseph Legare
Assistant Manager for Environment and Stewardship
U S Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

RE: Approval, Draft Industrial Area Sampling and Analysis Plan, FY04 Addendum #IA-04-14, (PACs 803 & 804), March 2003

Dear Mr Legare

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants approval for the subject document. A comment resolution meeting on April 15, 2004 was successful in resolving the Division's written comments on the initial document. Those comments are attached for reference.

We look forward to verifying the final, revised document. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or Harlen Ainscough at 303-692-3337.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachment

COR CONTROL	X	X
ADMIN RECORD	X	X
PATS/130	X	X

Reviewed for Addressee
Corres Control RFP

5/6/04
Date By

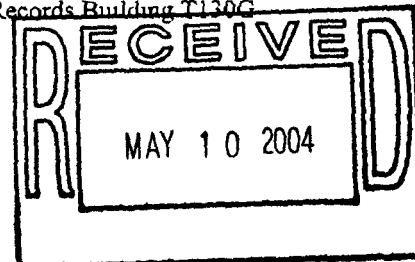
Ref Ltr #

DOE ORDER #

5100.1

cc Mark Aguilar, EPA
Norma Castaneda, DOE
Lane Butler, KH

Mark Sattelberg, U S F&W
Dave Shelton, KH
Administrative Records Building T130G



ADMIN RECORD

H\RFETS\400-4 IHSS Group SAP Addendum (#IA-04-14), PAC 803 & 804 Approval doc

IA-A-002110

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Industrial Area

Sampling and Analysis Plan

FY 04 Addendum #IA-04-14

IHSS Group 400-4

March 2004

Discussion Comments:

1. The Division believes that more careful consideration of the information upon which PAC 400-803 and 400-804 were based, although limited, would have provided an investigation approach better suited to determining the residual affect, if any, of the releases
2. Although the HHR (1992-PAC 400-803), as restated in the IASAP, notes that a roofing contractor dumped miscellaneous material into "the storm drain immediately west of Building 446", the investigation focuses on multiple "storm drains" After accounting for the B446 drain influent location, the addendum then shows sampling locations down gradient at other drain influent and effluent locations rather than the "open ditch south of Cottonwood Avenue" Figure 4 depicts the ditch but, unfortunately, no sample locations are proposed along its immediate course Only CA38-024, far down gradient after the stream crossed beneath Cottonwood Ave, appears to be on the channel
3. Information on the dumping of silver paint, and possibly oil and aluminum paint, by a roofing contractor provides an opportunity to learn more about the potential COCs The Division suggest that roofing contractors be contacted to determine wastes streams prevalent in 1972 For example, were any VOCs included in recoating processes that would warrant adding VOCs as a COC? (The use of silver paint probably excludes any specific concern over VOCs) Lastly, knowing the composition of the B444 roof could prove to be enlightening, possibly to exclude SVOCs since silver paint appears to have been used on the building Work order or contracts, if archived, may be of value
4. The HRR (PAC 400-804) describes damage to the road north of Building 444 and the covering of radionuclide hot spots with asphalt patching material The references to damage, multiple hot spots, and patching material strongly suggest that the road was hard paved not dirt or gravel The HRR further states that photographs were located that documented the cleanup and/or monitoring activities An attempt needs to be made to re-locate these photographs and to determine whether the point(s) of ingot impact and contamination can be more closely defined by comparisons to structures, the foothills, the road shoulder, utility poles, etc, to support both biased sampling and remediation
5. The day after the release, following precipitation, radiological activity up to 500 cpm and smears to 104 dpm were registered If the road was paved at the time, as expected, the potential existed for radionuclides to be carried to one or both shoulders of the road The current sampling plan may address potential contaminant migration, alongside the road by chance rather than by design It is also probable that the contamination is between layers of asphalt not in soil beneath the road

Specific Comments

- 6 Section 2.2, page 6, 1st para - This paragraph should be re-written to separate the discussion of sampling strategies from PAC 400-803 and it from the discussion of PAC 400-804. The discussion of the PACs begins with 804 then runs back and forth, considering the second paragraph of page 6, between 803 and 804. Doing so will promote a more complete discussion of the PACs after consideration of Comments 1 through 5.
- 7 Considering Comment No. 2, the Division expects that sampling at storm drains will be revised to concentrate on the "open ditch" rather than storm drains that are not actually pertinent to the release. Several corresponding changes to the document will be necessary.
- 8 Considering Comment No. 3, the Division expects that it may be possible to revise the COC list. It may be possible to delete SVOCs, with a minor possibility of adding VOCs. (Although boring CB38-002, Figure 3, shows a SVOC exceedance, there is no clear association of the exceedance and either PAC.)
- 9 Considering Comment No. 4, locating photographs may allow biased sampling at more closely defined impact locations. (Although radionuclides may be bound within asphalt, sampling beneath the asphalt should serve to clear covered surface soils from further consideration.) It is unlikely that the proposed statistical locations are pertinent to the release but may inadvertently address Comment No. 5. Alternatively, rad surveys of the soil after removal and disposal of the asphalt, followed by soil sampling beneath any survey hot spots, are expected to be a better approach than statistical sampling at the edges of the unit.
- 10 Considering Comment No. 5, the shoulder of the road needs to be investigated for radionuclides. The photographs, if re-located, may provide an opportunity to better target the investigation.